

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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In Re:

Tri-State Paper, Inc.

Debtor  
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Chapter 11

Bankruptcy Number: 23-13237

DATE AND TIME OF HEARING:  
February 28, 2024 – 9:30 A.M.

RESPONSES DUE: February 21, 2024

**NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE**

CITIZENS BANK, N.A. and TRI-STATE PAPER, INC. have filed a Joint Motion for and Order Approving the Stipulation of Settlement by and between the Bank and the Debtor (the “Motion”).

**Your rights may be affected. You should read these papers carefully and discuss them with an attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the court to grant the Motion or if you want the court to consider your views on the Motion, then on or before **February 21, 2024**, you or your attorney must do all of the following:

- a. File an answer explaining your position at:  
Clerk of the Bankruptcy Court  
Robert N.C. Nix, Sr., Federal Courthouse  
900 Market Street  
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk’s office for filing, you must mail it early enough so it will be received on or before the date stated above; and

- b. Mail a copy to movants’ attorney:  
Kristen Wetzel Ladd  
Unruh, Turner, Burke & Frees, P.C.  
P.O. Box 515  
17 West Gay Street  
West Chester, PA 19381  
(610)692-1371

2. If you or your attorney do not take the steps described in paragraphs 1(a) and (b) above and attend the hearing, the Court may enter an order granting the motion.
3. **A hearing on the motion is scheduled to be held before the Honorable Patricia M. Mayer, Bankruptcy Judge, on February 28, at 9:30 A.M., at the United States Bankruptcy Court, Eastern District of Pennsylvania, Courtroom #1, 900 Market Street, Philadelphia, PA 19107. Unless the court orders otherwise, the hearing on this contested matter will be an evidentiary hearing at which witnesses testify with respect to the disputed material factual issues in the manner directed by Fed. R. Bankr. P. 9014(d).**
4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been cancelled because no one filed an answer.

Date: January 31, 2024

Respectfully submitted,

/s/ Kristen Wetzel Ladd

Kristen Wetzel Ladd, Esquire

ID# 208755

Unruh Turner Burke & Frees, P.C.

17 W. Gay Street

West Chester, PA 19381

*Counsel for Citizens Bank, N.A.*